

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 04-CR-10126-RWZ

UNITED STATES OF AMERICA

v.

VICTOR VARGAS

JOINT MOTION FOR EXCLUDABLE DELAY FOR  
THE PERIOD MAY 18, 2005, THROUGH JULY 18, 2005

At the pre-trial conference on May 18, 2005, defense counsel requested that trial in this case be scheduled for July 18, 2005, in order to provide additional time to further discuss the case with his client, to determine whether the case will be resolved by trial or plea, and to adequately prepare for trial. The Court granted this request and scheduled trial for July 18, 2005.

Therefore, the parties agree, and request the Court to order, that the period between May 18, 2005, and July 18, 2005, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(8)(A) in that the ends of justice outweigh the best interest of the defendant and the public in a speedy trial. A proposed order is attached to this motion.

WHEREFORE, the parties request that the period of May 18, 2005, through July 18, 2005, be excluded for purposes of the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: Sandra S. Bower for  
CHARLES MCGINTY  
Federal Defender's Office  
408 Atlantic Ave.  
Boston, MA 02210

By: Sandra S. Bower  
SANDRA S. BOWER  
Assistant U.S. Attorney  
U. S. Attorney's Office  
John Joseph Moakley  
United States Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210